

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-
FLW-LHG
MDL No. 2738**

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF MICHELLE A. PARFITT, ESQ.

Michelle A. Parfitt, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Ashcraft & Gerel, LLP. I was appointed as Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Defendant's Toxicology Experts Brooke T. Mossman, MS, PhD, Kelly S. Tuttle, PhD, and H. Nadia Moore, PhD.
3. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Brooke Taylor Mossman, MS, PhD, dated February 25, 2019.
4. Attached hereto as Exhibit B is a true and correct copy of the Deposition of Brooke T. Mossman, MS, PhD, dated April 8, 2019.

5. Attached hereto as Exhibit C is a true and correct copy of Fletcher, et al., *Molecular Basis Supporting the Association of Talcum Powder Use with Increased Risk of Ovarian Cancer*, 20 Reproductive Sciences 1 (2019).

6. Attached hereto as Exhibit D is a true and correct copy of the Expert Report of Kelly S. Tuttle, PhD, dated February 25, 2019 (FILED UNDER SEAL).

7. Attached hereto as Exhibit E is a true and correct copy of Defendants' Response to Plaintiffs' Document Requests Contained in Notice of Oral and Videotaped Deposition of Nadia Moore, PhD, DABT, ERT, and Duces Tecum, dated April 3, 2019 (FILED UNDER SEAL).

8. Attached hereto as Exhibit F is a true and correct copy of the Expert Report of H. Nadia Moore, PhD, dated February 25, 2019 (FILED UNDER SEAL).

9. Attached hereto as Exhibit G is a true and correct copy of the Trial Transcript of H. Nadia Moore, PhD, dated January 19, 2018, *Oakland Bulk & Oversized Terminal, LLC v. City of Oakland*, No. C 16-7014 VC.

10. Attached hereto as Exhibit H is a true and correct copy of the Deposition of H. Nadia Moore, PhD, dated April 4, 2019.

11. Attached hereto as Exhibit I is a true and correct copy of Amrhein, et al., *Retire Statistical Significance*, 567 Nature 305 (2019).

12. Attached hereto as Exhibit J is a true and correct copy of Hill, *The Environment and Disease: Association or Causation?*, 58 Proc. Royal Soc'y Med. 295 (1965).

13. Attached hereto as Exhibit K is a true and correct copy of the Rule 26 Expert Report of Judith Zelikoff, PhD, dated November 16, 2018.

14. Attached hereto as Exhibit L is a true and correct copy of excerpts from IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, *Arsenic, Metals, Fibres, and Dusts*, Vol. 100C: A review of Human Carcinogens, 2012.

15. Attached hereto as Exhibit M is a true and correct copy of Shukla, et al., *Alterations in gene expression in human mesothelial cells correlate with mineral pathogenicity*, Am J Respir Cell Mol Biol, 2009;41:114-123.

16. Attached hereto as Exhibit N is a true and correct copy of a Letter from Brooke T. Mossman, PhD to Junius C. McElveen, Esq., dated January 12, 1990, Exhibit 5 from the Deposition of Brooke T. Mossman, PhD, April 8, 2019.

17. Attached hereto as Exhibit O is a true and correct copy of Draft Screening Assessment, Talc, Environment and Climate Change Canada, Health Canada, December 2018.

18. Attached hereto as Exhibit P is a true and correct copy of the FDA Response to Samuel S. Epstein, M.D.'s Citizen Petitions, dated April 1, 2014.

19. Attached hereto as Exhibit Q is a true and correct copy of the Deposition of Kelly S. Tuttle, PhD, dated April 11, 2019.

20. Attached hereto as Exhibit R is a true and correct copy of excerpts from Klaasen, "General Principles of Toxicology", *Casarett and Doull's toxicology: The basic science of poisons*, 8th ed, New York: McGraw-Hill, 2013.

21. Attached hereto as Exhibit S is a true and correct copy of a demonstrative comparing the Expert Report of John A. Kind, Ph.D., dated April 1, 2012, Expert Report of John A. Kind, Ph.D., dated September 16, 2016, and Expert Report of Kelly S. Tuttle, PhD, dated February 25, 2019 (FILED UNDER SEAL).

22. Attached hereto as Exhibit T is a true and correct copy of the Rule 26 Expert Report of Laura M. Plunkett, PhD, DABT, dated November 16, 2018 (FILED UNDER SEAL).

23. Attached hereto as Exhibit U is a true and correct copy of the Deposition of Laura Plunkett, PhD, DABT, dated December 19, 2018.

24. Attached hereto as Exhibit V is a true and correct copy of excerpts from IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Vol. 93: *Carbon Black, Titanium Dioxide and Talc*, 2010.

25. Attached hereto as Exhibit W is a true and correct copy of Nony, et al., Synthetic vitreous fibers, 2014;445-453, Exhibit 30 from the Deposition of Kelly S. Tuttle, PhD, dated April 11, 2019.

26. Attached hereto as Exhibit X is a true and correct copy of the curriculum vitae of Ghassan Saed, Ph.D.

27. Attached hereto as Exhibit Y is a true and correct copy of the curriculum vitae of William Longo, Ph.D.

28. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: May 7, 2019

/s/ Michelle A. Parfitt
Michelle A. Parfitt